UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE COMMISSION,))
Plaintiff,)
v.) Case No. 1:14-cv-11858-NMG
TELEXFREE, INC., TELEXFREE LLC, SANDERLEY RODRIGUES DE VASCONCELOS, et al)))
Defendants,)))

PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S MOTION FOR MEMORANDUM OF LIS PENDENS

Plaintiff Securities and Exchange Commission ("Commission") respectfully requests that the Court endorse the Memorandum of *Lis Pendens* ("Memorandum") filed herewith. The purpose of the Memorandum is to provide notice, pursuant to Florida General Laws Chapter 48 Section 23, of the pendency of the instant action and of the Court's allowance of the Commission's motion for a preliminary injunction, asset freeze, and other equitable relief, to individuals interested in, *inter alia*, purchasing, attaching, or encumbering certain real properties relative to Defendant Sanderley Rodrigues DeVasconcelos located at:

- 1) 5600 N. Flagler Drive, #307, West Palm Beach, FL
- 2) 1014 17th Street, West Palm Beach, FL
- 3) 711 Division Avenue, West Palm Beach, FL
- 4) 1103 18th Street, #1, West Palm Beach, FL

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION,

By its attorney,

/s/ Frank C. Huntington
Frank C. Huntington (Mass. Bar No. 544045)
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Dated: August 5, 2015

CERTIFICATE OF SERVICE

I certify that this document filed through the Court's Electronic Case Filing (ECF) system on August 5, 2015, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Frank C. Huntington Frank C. Huntington